

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Dawn Mitchell,

Civil File No. 13-CV-2167 (JNE/FLN)

Plaintiff,

v.

**DECLARATION OF
SONIA MILLER-VAN OORT**

Aitkin County, *et al.*,

Defendants.

I, Sonia Miller-Van Oort, declare, in accordance with 28 U.S.C. § 1746, as follows:

1. I am an attorney for Sapientia Law Group and represent Plaintiff Dawn Mitchell in this case as part of her legal team.
2. Attached to this Declaration as **Exhibit J** are true and correct copies of Dawn Mitchell's Deposition, dated July 24, 2017.
3. Attached to this Declaration as **Exhibit J-2** is a true and correct copy of the confidential portion of Dawn Mitchell's Deposition, dated July 24, 2017. **Exhibit J-2** has been marked CONFIDENTIAL and will be filed under seal.
4. Attached to this Declaration as **Exhibit K** are true and correct copies of Jeff Elasky's Deposition, dated June 7, 2017.
5. Attached to this Declaration as **Exhibit K-2** is a true and correct copy of the confidential portion of Jeff Elasky's Deposition, dated July 7, 2017. **Exhibit K-2** has been marked CONFIDENTIAL and will be filed under seal.

6. Attached to this Declaration as **Exhibit L** are true and correct copies of Brian Hubbard's Deposition, dated June 19, 2017.

7. Attached to this Declaration as **Exhibit M** are true and correct copies of Douglas Wagner's Deposition, dated June 22, 2017.

8. Attached to this Declaration as **Exhibit N** are true and correct copies of Mark Melander's Deposition, dated June 23, 2017.

9. Attached to this Declaration as **Exhibit O** are true and correct copies of Paul Buell's Deposition, dated June 19, 2017.

10. Attached to this Declaration as **Exhibit P** are true and correct copies of Ryan Schultz's Deposition, dated June 23, 2017.

11. Attached to this Declaration as **Exhibit Q** are true and correct copies of excerpts from Plaintiff Mitchell's verified answers to Defendants' Interrogatories.

12. Attached to this Declaration as **Exhibit R** is a true and correct copy of the email exchange between Plaintiff and Kim Jacobson at DPS regarding Plaintiff's request for her audit.

13. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 6, a License Plate Access Audit obtained by the City of Edina from the State of Minnesota.

14. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 7, Paul Buell's Log Report, dated December 20, 2011.

15. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 8, Brian Hubbard's Log Report, dated July 20, 2010.

16. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 9, Brian Hubbard's Log Report, dated September 6, 2011.

17. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 10, Mark Melander's Log Report, dated October 1, 2009.

18. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 11, Ryan Schultz's Log Report, dated October 4, 2009.

19. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 12, Douglas Wagner's Log Report, dated October 10, 2011.

20. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 13, Edina Police Operations Manual, Policy Number 100.

21. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 14, Edina Police Operations Manual, Policy Number 735.

22. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 16, Edina Police Operations Manual, Policy Number 330.

23. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 17, Edina Police Operations Manual, Policy Number 360 IA.

24. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 18, Edina Police Operations Manual, Policy Number 320.

25. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 20, Edina Police Operations Manual, Policy Number 740.

26. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 21, Edina Police Officer Job Summary.

27. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 28, Edina Responses to Plaintiff's First Set of Interrogatories and Requests for Production of Documents.

28. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 29, Edina DVS Audit.

29. Attached to this Declaration is a true and correct copy of Edina Depo Exhibit 37, Edina 96-Hour Audit.

30. Attached to Declaration is a true and correct copy of work-related records and notes produced by Plaintiff Dawn Mitchell as Bates Nos. MITCHELL440- 451 related to her work schedule on particular days and broadcasts that she was involved in.

31. Attached to this Declaration are true and correct copies of receipts and checks paid by Plaintiff Mitchell related to costs she expended in purchasing a new gate and locks for her home, previously marked as Deposition Ex. 104.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and corrected.

/Sonia Miller-Van Oort
Sonia Miller-Van Oort